

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF INDIANA, SOUTH BEND DIVISION**

ANDREW ROYER,)	
)	No. 22-CV-254
Plaintiff,)	
)	
v.)	Hon. Judge Jon E. DeGuilio
)	
CITY OF ELKHART, et al.)	Hon. Mag. Judge Michael G. Gotsch,
)	Sr.
Defendants.)	
)	JURY TRIAL DEMANDED
)	
)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO
DEFENDANT CITY OF ELKHART’S RESPONSE TO
PLAINTIFF’S MOTION TO COMPEL**

Now comes Plaintiff, ANDREW ROYER, by and through his counsel, and respectfully moves this Court for a short extension of time until June 20, 2023, to respond to Defendant City of Elkhart’s opposition to Plaintiff’s Motion to Compel former Chief Seymour’s deposition.

1. Plaintiff filed a Motion to Compel the City of Elkhart to Produce Retired Chief Seymour for a Deposition and to Produce Documents Responsive to a Subpoena on May 17, 2023. Dckt. 135.

2. Defendant City of Elkhart then filed a Motion for a Protective Order on May 24, 2023, seeking to bar depositions of former Chief Seymour and Elkhart Mayor Roberson. Dckt. 140, 141.

3. Defendant City filed their response to Plaintiff’s Motion to Compel on June 6, 2023. Dckt. 144.

4. The Court granted Plaintiff an extension of time until June 19, 2023, to respond to Defendant City’s Motion for a Protective Order. Dckt. 146.

5. Because of the dual briefing tracks, Plaintiff seeks a short extension until June 20, 2023, to reply to Defendant City's opposition to Plaintiff's Motion to Compel.

6. Counsel also had had other obligations, including preparing for upcoming depositions in this case (scheduled for June 27, 28, and 29, 2023), depositions in *Mack Sims v. City of Elkhart* (June 6 and June 8, 2023), mediation in *Jeffrey Clark v. Louisville-Jefferson Cnty.*, No. 3:17-CV-419-DJH-CHL (W.D. Ky.) (beginning May 31, 2023), and various discovery matters in other cases, causing this request for an extension of time.

7. Counsel for Defendant City of Elkhart does not oppose this extension of time.

DATED: June 14, 2023

Respectfully submitted,

/s/ Elliot Slosar

Jon Loevy
Elliot Slosar
Margaret E. Campbell
LOEVY & LOEVY
311 N. Aberdeen, 3rd Fl
Chicago, IL 60607
312-243-5900

CERTIFICATE OF SERVICE

I, Elliot Slosar, an attorney, hereby certify that on June 14, 2023, I filed the foregoing motion via the Court's CM/ECF System and thereby served a copy on all counsel of record.

/s/ Elliot Slosar